

# Atlantic Richfield Company

Anthony R. Brown  
Project Manager Mining

4 Centerpointe Drive  
La Palma, CA 90623-1066  
Office: (714) 228-6770  
Fax: (714) 228-6749  
E-mail: Anthony.Brown@bp.com

November 5, 2013

Mr. Steven Way  
On-Scene Coordinator  
Emergency Response Program (8EPR-SA)  
U.S. EPA, Region 8  
1595 Wynkoop Street  
Denver, CO 80202-1129

**RE: Proposed Construction Schedule  
St. Louis Tunnel Discharge Constructed Wetland Demonstration Treatability Study  
Rico-Argentine Mine Site – Administrative Order for Removal Action (“UAO”)  
Docket No. CERCLA-08-2011-0005  
Dolores County, Colorado**

Dear Mr. Way:

This letter notifies the United States Environmental Protection Agency (U.S. EPA) of Atlantic Richfield's intent to temporarily suspend field operations associated with the Rico-Argentine Mine site St. Louis Tunnel Discharge Constructed Wetland Demonstration Treatability Study (wetland demonstration). As described in the *St. Louis Tunnel Discharge Constructed Wetland Demonstration Treatability Study Work Plan, Revision 1* (Work Plan) dated October 2013, the wetland demonstration was intended to be constructed and commissioned for operation during autumn 2013. However, due to extreme rainfall experienced in September 2013 and the subsequent early onset of winter conditions at the site, Atlantic Richfield is suspending construction of the wetland demonstration for the remainder of 2013. Suspending construction activities at this stage will allow us to maintain the integrity of the work completed. Additionally, system startup and microbial colonization during the spring will be more conducive to microbial development and growth because of warmer temperatures.

We currently are completing certain items to protect the existing wetland demonstration work completed to date from winter impacts such that the work will be stabilized, protected, and ready for construction to resume in the spring of 2014. We will be phasing out field operations over the next few weeks. This delay also will provide Atlantic Richfield the time to develop a unified design and specifications package incorporating a demonstration-scale vertical flow system that complements and integrates with the existing horizontal flow wetland demonstration. This unified design and specifications package will be submitted to the U.S. EPA by December 31, 2013.

As site conditions permit, construction activities are anticipated to resume in the spring, on or about May 15, 2014, or as soon as weather permits. We anticipate that construction of the wetland demonstration will be completed and commissioning will commence by June 30, 2014.

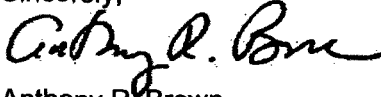
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Please contact me with any questions, comments, or concerns regarding this suspension of field operations or the proposed modification of the construction schedule.

Sincerely,



Anthony R. Brown  
Project Manager Mining  
Atlantic Richfield Company

cc: Ronald Halsey, Atlantic Richfield Company (via e-mail)  
Terry Moore, Atlantic Richfield Company (via e-mail)  
Sheila D'Cruz, Atlantic Richfield Company (via e-mail)  
Reginald Ilao, Atlantic Richfield Company (via e-mail and hardcopy)  
William Duffy, Esq., Davis, Graham & Stubbs, LLP (via e-mail)  
Adam Cohen, Esq., Davis Graham & Stubbs, LLP (via e-mail)  
Sandy Riese, EnSci, Inc. (via e-mail)  
Jerry Johnson, JCMC (via e-mail)  
Marc Lombardi, AMEC Environment & Infrastructure, Inc. (via e-mail)  
Spencer Archer, AMEC Environment & Infrastructure, Inc. (via e-mail)  
Tom Kreutz, AECOM Technical Services, Inc. (via e-mail)  
Doug Yadon, AECOM Technical Services, Inc. (via e-mail)  
Bryan Wheeler, AEEC, LLC (via e-mail)  
Chris Sanchez, Anderson Engineering Company, Inc. (via e-mail)  
Dave McCarthy, Copper Environmental Consulting, LLC (via e-mail)  
Jan Christner, Weston Solutions, Inc. (via e-mail)

